Enviva Pellets Greenwood, LLC PUBLIC HEARING



All lines will be muted to avoid echo or feedback



Opportunity for comments following presentation



Meeting will be recorded to share as a resource



Option to Call In

If you are experiencing audio problems, join the virtual meeting by phone:

Phone number: 1 864-558-7311

Access Code: 634342648#



Exits the meeting. (If you accidentally exit the meeting, you can rejoin.)



Be smart. Stay 6 feet apart.

Stop the Spread of COVID-19



Wash hands often



Stay home while sick



Cover coughs and sneezes



Clean surfaces often



South Carolina Department of Health and Environmental Control

Enviva Pellets Greenwood, LLC Draft Air Permit

PUBLIC HEARING August 20, 2020



Public Hearing Agenda

- Instructions for participating remotely
- Introductions and Opening Remarks
- Overview of Proposed Project
- Public Comments
- Next Steps and Closing Remarks
- Hearing Adjourned



Permitting Process

- Application received and reviewed for technical completeness
- Determine type of permit required
- Draft permit
- Public Input
- Final Permit Decision



Site Overview

- Originally built and operated by Colombo Energy
 - o September 22, 2016
- Enviva Pellets Greenwood, LLC
 - Purchased and began operating the facility on March 7, 2018
 - Wood pellet manufacturing facility
 - Produces wood pellets that are used for fuel in industrial boilers







Proposed Project Overview

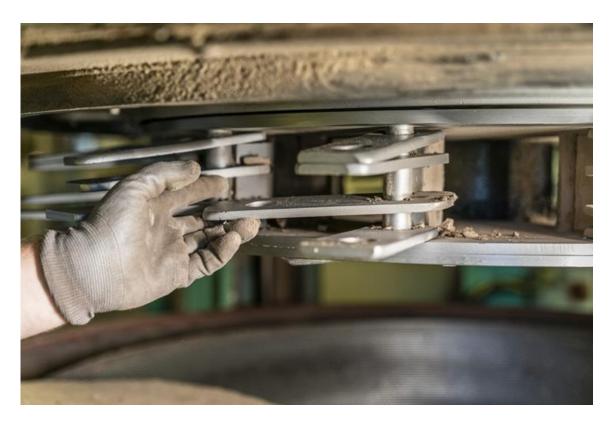
- Reduce particulate matter (dust) emissions
 - More efficient process equipment
 - Pollution control device upgrades
 - New additional particulate control equipment

• Increase production to 660,000 oven-dried tons per year (25% increase)

Dry Hammermills



Example of horizontal dry hammermills (existing)



Example of a hammer inside a vertical dry hammermill (proposed)



New Vertical Dry Hammermills

- Particulate matter (PM) emissions will be decreased
 - Improved efficiency for reducing the wood chips size
 - Existing Wet Electrostatic Precipitator (WESP) will replace specific Cyclofilters
 - Addition of a second PM control device (Bin Vent Filter)
- Volatile Organic Compounds (VOCs) emissions will be decreased
 - Existing Regenerative Thermal Oxidizer (RTO)



New Pelletizers

- Addition of three pelletizers
- Addition of one pellet cooler
- Addition of PM control device (Baghouse)







Green Hammermill

- Emissions controlled by existing equipment
 - PM emissions controlled by wet electrostatic precipitator (WESP)
 - VOC emissions controlled by regenerative thermal oxidizer (RTO)

Summary of Proposed Changes

Equipment and	explanation

How emissions will be controlled

Vertical Dry Hammermills

- Replace (5) existing dry hammermills with (36) new dry hammermills
- Improve efficiency for reducing the wood chips size
- Route dry hammermills emissions to existing Wet Electrostatic Precipitator (WESP) to control particulate matter (PM) and to existing Regenerative Thermal Oxidizer (RTO) to control volatile organic compounds (VOCs) emissions
- Addition of second PM control device (Bin Vent Filter)

Pelletizers

Add three pelletizers and one pellet cooler

Addition of New PM control device (Baghouse)

Green Hammermill

• Add one green hammermill

Existing pollution control equipment

- PM control device (WESP) and
- VOC destruction device (RTO)



Enviva's Pollution Control Equipment

- Particulate Matter Removal
 - Wet Electrostatic Precipitator (WESP)
 - Baghouses, Baghouses with integrated Cyclones, Cyclone, Bin Vent Filters
- Volatile Organic Compounds (VOCs) destruction
 - Regenerative Thermal Oxidizer (RTO)
 - Regenerative Thermal Oxidizer / Regenerative Catalytic Oxidizers (RCO)



Air Quality Analysis

Air Pollutant	Max Predicted Concentration (μg/m³)	Background Concentration (µg/m³)	Total Concentration (µg/m³)	State/Fed. Standard (µg/m³)	Meets Standard?
PM ₁₀ 24-hr	33.2	60	93	150	Yes
PM _{2.5} 24-hr	16.0	16.4	32	35	Yes
PM _{2.5} Annual	2.5	8.3	11	12	Yes



Draft Air Construction Permit Regulatory Requirements

Applicable State Regulations	Applicable Federal Regulations
SC Regulation 61-62.1, Section II. E	• 40 CFR 63 Subpart IIII
SC Regulation 61-62.1, Section IV	• 40 CFR 63 Subpart ZZZZ
• SC Regulation 61-62.5, Standard No. 1	
• SC Regulation 61-62.5, Standard No. 3	
• SC Regulation 61-62.5, Standard No. 4	
• SC Regulation 61-62.5, Standard No. 5.2	
SC Regulation 61-62.6 – Fugitive Dust	



Draft Air Construction Permit Limits

Criteria Pollutants

- PM
- PM₁₀
- PM_{2.5}
- VOCs

Limited to less than 250.0 tons per year each

Hazardous Air Pollutants (HAPs)

Limited to less than 10.0 tons per year (each) and less than 25.0 tons per year (total)

Total Production

Limited to 660,000 oven-dried tons per year



Draft Air Construction Permit Requirements

- Maintain current permitted production rate until all control device upgrades and additions have been completed
- Conduct periodic source tests
- Maintain records and submit reports
- Follow the dust control plan



Dust Control Plan

- Includes steps to minimize fugitive particulate matter (dust) generated on site from going beyond facility property boundaries
- Minimum requirements include:
 - Written procedures, training plans, and a maintenance schedule for all particulate matter control equipment and process systems
 - Use of water truck on onsite roads
- Required to be updated when needed

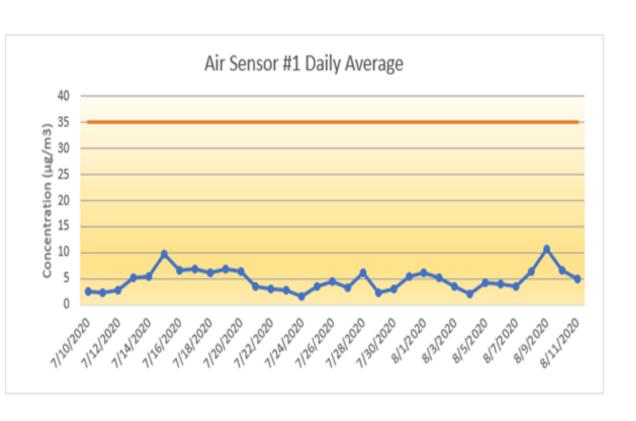
Ambient Sensors

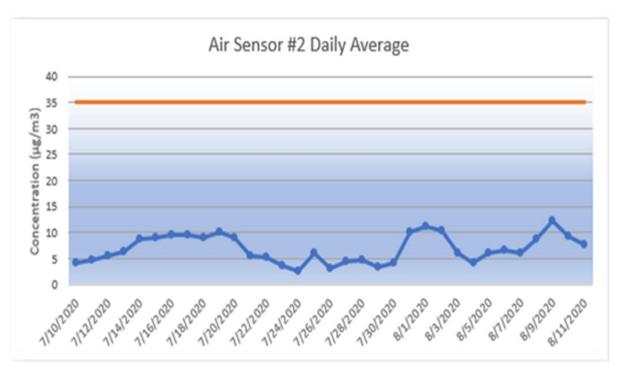
- Two (2) Air Sensors in the community to monitor $PM_{2.5}$ trends
 - Requested by community members
- Air Sensors are small, inexpensive, and easy to install
 - Not federally regulated





Ambient Sensor Data





Trends from both sensors are below the air quality PM Standard



Compliance Status

- December 2018 March 2019
 - Several stack tests
 - In compliance with the emission limits
- 2019
 - Several inspections
 - Several permit and regulatory violations
- 2020
 - January: Notice of Alleged Violation and Notice of Enforcement Conference
 - July: Consent Order included civil penalty



Next Steps

- Review all comments received
- Provide written responses to all comments
- Make a final decision
- Final decision date begins 15-day appeal period



DHEC Contacts

Central office

Air Permitting Division

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Columbia, SC 29201

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Local office

Upstate EA Greenwood Office

Attn: Samuel Madden

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maddensi@dhec.sc.gov

www.scdhec.gov/Enviva



How to Comment

Submit comments by mail or email through August 27, 2020 to:

> BAQ Public Notice Coordinator DHEC/BAQ 2600 Bull Street Columbia, SC 29201

AirPNcomments@dhec.sc.gov

Application and draft permit can be found at: www.scdhec.gov/Enviva

Provide Official Comment For The Record



Unmute to indicate you would like to speak



Unmuted lines will be called on to speak



Click the Hand Raise icon to be called on to speak



Hand Raise (click this icon to indicate you would like to speak)



Muted (no one in the meeting can hear you)



Unmuted (everyone in the meeting can hear you)



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